

**REMARKS**

**Status of the Claims**

Claims 1-16 are now present in this application, of which claims 1, 2, 9, 11, and 12 are independent.

Claim 6 has been canceled, claims 14-16 have been added, and claims 1-3, 9, and 11-13 have been amended. Reconsideration of this application, as amended, is respectfully requested.

**Summary of Examiner Interview**

Applicants express appreciation for courtesies extended to their representative in a telephonic interview conducted May 13, 2010. In the interview Applicants' attorney, James C. Larsen, discussed perceived differences between the applied prior art and present independent claims, in particular the failure of Kato and Chen to disclose or make obvious the inclusion of each claimed filtering region within a block region. Examiner Patel expressed the belief that the now-presented clarifying amendment is likely to overcome the applied prior art. However, no agreement was reached.

**Information Disclosure Citation**

Applicants thank the Examiner for considering the reference(s) supplied with the Information Disclosure Statement filed November 20, 2006, and for providing Applicants with an initialed copy of the PTO-SB08 form filed therewith. Applicants note that reference "BE", JP-2001-230927-A was crossed out as not considered "due to the fact that there is no translation of the reference." (Office Action of August 18, 2009, page 2.) However, as noted on page 2 of the IDS letter submitted November 20, 2006, "U.S. Patent Application No. 2001/024242-A1 corresponds to Japanese unexamined patent application No. JP-2001-23097." That U.S. Patent application was cited on Form PTO/SB/08 and was apparently considered. Accordingly, Applicants respectfully submit that a "concise explanation" of the Japanese reference was provided and considered. Please provide a copy of the PTO/SB/08 showing that all references were considered.

### **Drawings**

Applicants thank the Examiner for indicating, in the August 18, 2009 Office Action, that the drawings are accepted.

### **Previous Objection to the Abstract of the Disclosure**

The Abstract was previously objected to and subsequently amended. Since no mention is made in the most recent Office Action, Applicants presume that the Abstract is acceptable and that the objection is withdrawn.

### **Claim Objections**

The Examiner objects to claim 13 because of informalities. In order to overcome this objection, Applicants have amended claim 13 in order to correct the deficiencies pointed out by the Examiner. Reconsideration and withdrawal of this objection are respectfully requested.

### **Rejections under 35 U.S.C. § 103**

- a) Claims 1, 2, 6, and 8-13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,744,927 issued to *Kato* (hereinafter “*Kato*”) in view of the U.S. Publication No. 2004/0252903 of *Chen* (hereinafter “*Chen*”).
- b) Claim 3 stands rejected under § 103(a) as unpatentable over *Kato* in view of *Chen* and further in view of U.S. Patent No. 6,546,052 issued to *Maeda et al.* (herinafter “*Maeda*”).
- c) Claim 4 stands rejected under § 103(a) as unpatentable over *Kato* and *Chen* in further view of the U.S. Publication No. 2005/0175251 of *Taketa et al.* (hereinafter “*Taketa*”).
- d) Claim 5 stands rejected under § 103(a) as unpatentable over *Kato*, *Chen*, and *Taketa* in further view of the U.S. Publication No. 2005/0146610 of *Creamer et al.* (hereinafter “*Creamer*”).
- e) Claim 7 stands rejected under § 103(a) as unpatentable over *Kato* and *Chen* in further view of U.S. Patent No. 2005/0175251 issued to *Zandi* (hereinafter “*Zandi*”).

These rejections are respectfully traversed.

A complete discussion of the Examiner's rejection is set forth in the Office Action, and is not being repeated here.

While not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that claim 6 has been cancelled, rendering its rejection moot.

With regard to the rejection of **independent claims 1, 2, 9, 11, and 12**, while not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that these claims have been variously amended to recite a combination of elements including "filtering region dividing [means/step by which] input image data [is divided] into a plurality of filtering regions ... wherein each of the filtering regions is a cluster which is included in and is smaller than said block region". This amendment is presented to clarify that which was previously recited in the claims. Applicants respectfully submit that this combination of elements as set forth in independent claims 1, 2, 9, 11, and 12 is not disclosed or made obvious by the prior art of record, including Kato and Chen.

The Examiner's Response portion of the Office Action states that "[t]he claim limitations do not require that the DCT processing and the filtering region are controlled to have a constant relationship." (OA, page 3.) By "constant", Applicants intended to express that each filtering region has a particular relationship with a single corresponding block region.

As to the particular relationship, the claim amendments clarify that, because each filtering region is included in and is smaller than the block region (i.e., made up of one or more rectangular regions resulting from dividing a block region by  $2^n$ ), no filtering region crosses the boundary of a block region. Thus, each filtering region has a relationship with a particular corresponding block region. On the basis of such configuration, the implicit result is a reduced number of AC coefficients in the orthogonal transform after the filtering processing, and a corresponding improvement in the compression efficiency.

In contrast, Kato indicates that when an important (i.e., face) region on which the filtering processing is not performed and the unimportant (i.e., non-face) region on which the filtering processing is performed are determined, the block region that is used for the subsequent DCT processing is not considered. That is, the face and non-face regions are not disclosed by Kato to have a particular relationship to any block region - the boundaries of the block region and unimportant region may overlap, and therefore the compression efficiency cannot effectively be improved through reduction of AC coefficients.

Applicants respectfully submit that the combination of elements as set forth in independent claims 1, 2, 9, 11, and 12 is not disclosed or made obvious by the prior art of record, including Kato and Chen, for the reasons explained above. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

With regard to dependent claims 3-8, 10, and 13, Applicants submit that these claims depend, either directly or indirectly, from the independent claim discussed, which are allowable for the reasons set forth above, and are therefore allowable based on their dependence. Moreover, the Maeda , Taketa, Creamer and Zandi references do not remedy the deficiencies of Kato and Chen. Reconsideration and allowance thereof are respectfully requested.

**Conclusion**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

Should there by an outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact James C. Larsen, Registration No. 58565 at the telephone number of the undersigned below to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Director is hereby authorized in this, concurrent, and future replies to charge any fees required during the pendency of the above-identified application or credit any overpayment to Deposit Account No. 02-2448.

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Respectfully submitted,

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